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Attorneys for Plaintiffs and the putative class

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DEV ANAND OMAN, TODD EICHMANN,
MICHAEL LEHR, and ALBERT FLORES,
individually, on behalf of others similarly
situated, and on behalf of the general public,

Plaintiff,

vs.

DELTA AIR LINES, INC.,
Defendant.

Case No. 3:15-cv-00131-WHO

**SUPPLEMENTAL DECLARATION OF
MATTHEW HELLAND IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PRIVATE ATTORNEYS
GENERAL ACT (PAGA)
REPRESENTATIVE ACTION
SETTLEMENT**

Date: June 20, 2024

Time: 10:00 AM

Courtroom: Video conference

Judge: Hon. William H. Orrick

1 I, Matthew C. Helland, declare:

2 1. I am an attorney with the law firm of Nichols Kaster, counsel of record for the
3 Plaintiffs in this matter. I make this declaration based upon my personal knowledge, and could so
4 testify if called to do so.

5 2. In my experience, PAGA cases that were filed prior to the 2016 creation of the
6 LWDA online portal sometimes do not appear in the portal. That happened in this case. As a
7 result, we were unable to upload the settlement agreement to the LWDA portal at the time of
8 filing the motion for preliminary approval.

9 3. My staff emailed the LWDA seeking direction. On May 22, 2024, a representative
10 from the LWDA advised us to file Plaintiffs' original PAGA notice letter and certified mail
11 receipt to generate an LWDA case number. We were advised that once these documents were
12 filed, an LWDA case number would be generated, allowing us to file the remaining documents.

13 4. My staff filed these initiating documents as directed on May 23, 2024. Thereafter
14 we received an LWDA case number.

15 5. My staff then uploaded the Settlement Agreement and Fourth Amended Complaint
16 to the LWDA website.

17 I declare under penalty of perjury that the foregoing is true and correct.
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19 Dated: May 23, 2024

20 By: /s/Matthew C. Helland
Matthew C. Helland
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